

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

RICHARD DASCHBACH and ELCINDA
PERSON, individually, and on behalf of all
others similarly situated,

Plaintiffs,

v.

ADVANCED MARKETING &
PROCESSING, INC. d/b/a PROTECT MY
CAR, a Florida corporation,

Defendant.

Case No. 1:20-cv-706-JL

**DEFENDANT ADVANCED MARKETING & PROCESSING, INC.'S
MOTION TO DISMISS FOR LACK OF SUBJECT-MATTER JURISDICTION**

Defendant, Advanced Marketing & Processing, Inc. d/b/a Protect My Car (“PMC”), by
and through undersigned counsel and pursuant to Federal Rule of Civil Procedure 12(b)(1),
hereby moves to dismiss Plaintiffs’ Class Action Complaint, filed June 10, 2020 (the
“Complaint”) (DE 1), with prejudice, for lack of subject-matter jurisdiction.

Dated: December 2, 2020

/s/ Steven J. Dutton

Steven J. Dutton (NH Bar. No.: 17101)

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*Attorneys for Defendant, Advanced Marketing &
Processing, Inc.*

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 2, 2020, I electronically filed the foregoing with the Clerk of the Court, using the CM/ECF system, which will send a notice of electronic filing to all counsel of record identified on the attached service list.

By: /s/ Steven J. Dutton
Steven J. Dutton

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